

November 20, 2019

The Honorable Ajit Pai Chairman Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: IB Docket No. 11-109

Dear Chairman Pai:

Competitive Carriers Association (CCA) commends your support for an FCC-led public auction of the C-band and applauds the actions you have taken to deploy other airwaves for terrestrial broadband services. As you and your fellow Commissioners promote U.S. leadership in 5G wireless communications and continue efforts to free up additional spectrum for the commercial marketplace, CCA urges you to swiftly approve the use of L-band frequencies, which could bring additional critical mid-band spectrum online this year.

A key differentiator of the L-band proceeding is that the associated spectrum can be deployed immediately in support of 5G services. Additionally, as both Ericsson and Nokia have determined, the proposed use of those frequencies are complementary to 5G uses of other bands, such as the C-band, and can be used to increase the utility and value of these other bands as part of heterogeneous deployments that enable the best of both worlds in terms of coverage and capacity. In short, L-band spectrum can play an important role in increasing the utility of other mid-band spectrum allocations, including C-band spectrum and CBRS, particularly in rural America.

As you have often indicated, speed matters for 5G. To realize the Administration's goal of deploying next-generation technologies as soon as possible, we must take advantage of every opportunity to maximize mid-band spectrum for terrestrial wireless use. Under your leadership, the Commission has strived to work with federal partners in good faith to achieve balanced approaches in regulatory matters. We strongly encourage you to continue utilizing the agency's long-established framework to determine harmful interference based on scientifically sound metrics that provide the certainty needed for utilization of all spectrum bands. This framework supports the private investments to necessary to ensure that consumers and businesses of all sizes have access to 5G technologies.

We encourage you to bring the long-pending L-band proposal to a close and support putting this spectrum to use to serve wireless consumers. Unleashing up to 40 megahertz of greenfield spectrum

will ensure that all Americans, no matter where they live, work or travel, will experience the advantages associated with next-generation communications sooner, rather than later.

Sincerely,

Steven K. Berry President & CEO

Cc: Commissioner Michael O'Rielly

Commissioner Jessica Rosenworcel

Commissioner Brendan Carr Commissioner Geoffrey Starks